

1 BRETT A. STROUD, ESQ. (SBN 301777)
2 LAUREN N. NAWORSKI, ESQ. (SBN 327351)
3 THE LAW OFFICES OF YOUNG WOOLDRIDGE, LLP
4 1800 30th Street, Fourth Floor
Bakersfield, CA 93301
Telephone: (661) 327-9661
Facsimile: (661) 327-0720
Email: bstroud@youngwooldridge.com
lnaworski-smith@youngwooldridge.com

7 Attorneys for Defendant
8 MINTER FIELD AIRPORT DISTRICT
9

10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

13 In Re:

14 Christian Gadbois,

15 Debtor

Case No. 2:19-bk-10187-VZ

Chapter 13

Adv. No. 2:21-ap-01158-VZ

17 Christian Gadbois,

18 Plaintiff

19 v.

20 Minter Field Airport District, a special district
formed under the California Airport District
Act; and Does 1-5, Inclusive

23 Defendants

16 **MOTION TO EXCLUDE EVIDENCE**

17 **Continued Pre-Trial Conference**

18 **DATE:** September 29, 2022

19 **TIME:** 11:00 a.m.

20 **PLACE:** Courtroom 1368

Edward R. Roybal Federal Building

255 E. Temple Street

26 Los Angeles, CA 90012

1 **TO: HON. JUDGE VINCENT ZURZOLO, INTERESTED PARTIES:**

2 Defendant Minter Field Airport District (“Defendant”) submits this Motion to Exclude
3 Evidence concurrently with the Pre-Trial Stipulation. Both parties reserve all rights to make
4 objections to oral testimony at trial.

5 **I. Exhibit 23**

6 A. Defendant moves to exclude Defendant’s Exhibit 23 as inadmissible for any
7 purpose based upon the following:

- 8 1. It is irrelevant. (FRE 401)
9 2. It is hearsay. (FRE 801-802)
10 3. It lacks foundation. (FRE 901)

11 B. Plaintiff’s response to the above motion is

12 1. Defendant’s income is relevant to the issue of punitive damages. This is a
13 public record of the state of California and a hearsay exception per FRE 803(8).

15 **II. Exhibit 24**

16 A. Defendant moves to exclude Defendant’s Exhibit 24 as inadmissible for any
17 purpose based upon the following:

- 18 1. It is irrelevant. (FRE 401)

19 B. Plaintiff’s response to the above motion is

20 1. Defendant’s insurance is relevant to the issue of punitive damages because
21 it evidences Defendant’s wealth and solvency.

23 **III. Exhibit 28**

24 A. Defendant moves to exclude Defendant’s Exhibit 28 as inadmissible for any
25 purpose based upon the following:

- 26 1. It is hearsay. (FRE 801-802)
27 2. It lacks foundation. (FRE 901)

B. Plaintiff's response to the above motion is

1. Plaintiff will testify at trial that this exhibit proves up his damages since it evidences the value of the flight helmets being held by Defendant.

IV. Exhibit 29

A. Defendant moves to exclude Defendant's Exhibit 29 as inadmissible for any purpose based upon the following:

1. It is hearsay. (FRE 801-802)
 2. It lacks foundation. (FRE 901)

B. Plaintiff's response to the above motion is

1. Plaintiff will testify at trial that this exhibit proves up his damages since it evidences the value of the flight helmets being held by Defendant.

Signature of Plaintiff or Attorney for Plaintiff:

09/15/2022 Michael Chekian, Esq.

Mr. e.

IT IS SO STIPULATED.

Signature of Defendant or Attorney for Defendant:

09/15/2022 Brett Stroud, Esq.

Bobby McElroy

Signature

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1800 30th Street, Fourth Floor, Bakersfield, CA 93301

A true and correct copy of the foregoing document entitled (*specify*): MOTION TO EXCLUDE EVIDENCE

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 09/15/2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Michael Chekian (Attorney for Christian Gadbois): mike@cheklaw.com

Nancy K Curry (Chapter 13 Trustee): trustee12la@aol.com

United States Trustee (LA): ustpregion16.la.ecf@usdoj.gov

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 09/15/2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Hon. Vincent P. Zurzolo

Los Angeles Division, U.S. Bankruptcy Court

Royal Federal Building

255 E. Temple Street, Suite 1360, Los Angeles, CA 90012

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

09/15/2022 Brett Stroud
Date Printed Name

/s/ Brett Stroud
Signature